

LAW OFFICES

## WILLIAMS &amp; CONNOLLY LLP

725 TWELFTH STREET, N.W.

WASHINGTON, D. C. 20005-5901

(202) 434-5000

FAX (202) 434-5029

MARGARET A. KEELEY

(202) 434-5137

mkeeley@wc.com

EDWARD BENNETT WILLIAMS (1920-1988)  
PAUL R. CONNOLLY (1922-1978)

July 11, 2003

Via Facsimile & First Class Mail

Jesse B. Hammock, Esq.  
Ober, Kaler, Grimes & Shriver  
120 East Baltimore St.  
Baltimore, MD 21202  
Facsimile: (410) 547-0699

*Re: KI v. WSC v. GSE*

Dear Jesse:

We write in regard to the depositions of Messrs. Malkin and Rakitin. While we appreciate your offer to make Messrs. Malkin and Rakitin available for deposition Tuesday through Saturday of the week beginning July 28, due to other commitments that cannot be re-arranged, those five consecutive days will not work.

There is no need or reason for Messrs. Malkin and Rakitin to be deposed during the same week, however. We thus again offer to schedule the deposition of one of the witnesses for Wednesday through Friday of that week, and then arrange for the second witness to be deposed in August.

On a related note, we have not received a response regarding sharing the costs of an interpreter for the depositions. Both Kurchatov and Western will have witnesses necessitating the use of interpreters for depositions and for trial. Our past experience has been for all parties to mutually agree upon an interpreter service, and then to share the costs of that service. Please let me know if you and GSE are in agreement with such an arrangement here.

Sincerely,

  
Margaret A. Keeley

cc: Charles L. Simmons, Jr. Esq.

